



# **EUROPACIFIC TUNA LTD**

February 28, 2006

## **DEPARTMENT OF THE INTERIOR**

### **MINERALS MANAGEMENT SERVICE**

**ATTN: Rules Processing Team (RPT)**

**381 Elden Street, MS-4024**

**Herndon, Virginia 20170-4817**

Dear Sir/Madam:

EuroPacific Tuna Ltd is a United States company based in New Orleans, Louisiana, that is developing offshore tuna aquaculture to be placed in relatively deep waters (130 - 660 feet) virtually out of sight from the shore (greater than 10 nautical miles off shore). Furthermore, we represent a European company that has developed a new type of wind energy unit (attached see new turbine design) that can also be placed in relatively deep waters (130 - 660 feet) virtually out of sight from the shore (greater than 10 nautical miles off shore). The deep water offshore wind energy and aquaculture farm combines clean renewable energy production (electricity, hydrogen, and oxygen) with sustainable organic tuna aquaculture.

We strongly believe that the regulatory program to implement portions of the Energy Policy Act of 2005, Section 388 - Alternate Energy Related Uses on the Outer Continental Shelf, should include the following provisions.

1. That each state, in conjunction with the appropriate local and federal agencies, identify large offshore sea site areas that avoid negative visual impact concerns of "close to shore" sites.
2. That a Mining Rights Principle (first come first served basis) be adopted as the method for allocating designated offshore sea sites. A 4 year period may be considered as a reasonable time period for the developer to initiate the project. It should be noted that the traditional bidding process as used in the United Kingdom and the Netherlands has clearly hindered the development of offshore clean renewable energy.
3. Alternate Energy and Aquaculture sites should be located far off shore (greater than 10 nautical miles) to avoid visual impact.
4. All Environmental Impact Assessments must be performed in conjunction with the appropriate local, state, and federal agencies. That is to say that there should be one process for the Environmental Impact Assessments that must include input from the local, state, and federal authorities.
5. Renewable Energy Production Incentive (REPI) must be further extended to support future development of clean renewable energy projects.

World Trade Center • 2 Canal Street Suite # 2201 • New Orleans, Louisiana 70130

Email: [bluefin@europacifictuna.com](mailto:bluefin@europacifictuna.com) • Internet: [www.europacifictuna.com](http://www.europacifictuna.com)

Phone: 504 524 4800 • Fax: 504 524 4850

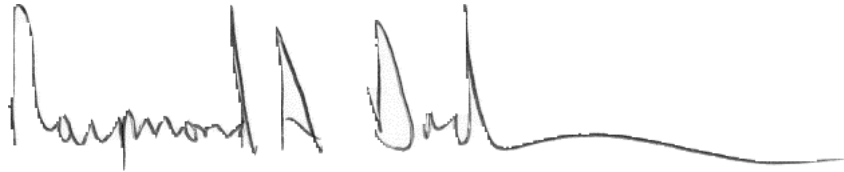
February 28, 2006

Contrary to existing beliefs, there is now technology to install wind farms far off shore (greater than 10 nautical miles) in relatively deep waters (130 - 660 feet). Our European affiliate will be installing a wind energy farm, financed partly with Italian public funds, this year off the Italian coast (12 nautical miles off shore) in deep waters (400 feet deep). This same technology will be available for installation in the United States in 2008.

Technology overseas is now in the process of converting combustion engines to hydrogen. Deep water offshore wind energy farms in Europe will be utilizing clean renewable energy to produce hydrogen, through the use of electrolyzers, to power hydrogen buses and vehicles. With a suitable process installed by the regulatory program to implement portions of the Energy Policy Act of 2005, similar development can occur in the United States in 2008.

Thank you in advance for your consideration of the above suggested recommendations. Please feel free to contact me via telephone or e-mail with your questions and comments.

Sincerely,

A handwritten signature in dark ink, appearing to read "Raymond A. Dackerman". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Raymond A. Dackerman

